

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

ALVERENE BUTLER,)	
)	
Plaintiff,)	
v.)	
)	CASE NO. 2:06-cv-00278-MEF-CSC
ALABAMA DEPARTMENT OF TRANSPORTATION, <i>et al.</i>,)	
)	
Defendants.)	

ITEMIZATION AND DOCUMENTATION FOR REQUESTED COSTS

Defendants submit the following costs to be taxed against Plaintiff:

1. Fees of the Clerk (appeal fees) – \$455.00. (Exhibit B).
2. Fees for Trial Transcript and Pre-trial conference – \$1,937.60. (See Exhibit C.)
3. Fees for copies of the following:

A. Discoverable documents:

251 copies @ \$.50 – \$125.50

Alverene Butler personnel file – 133 pages.

Karen Stacey personnel file – 91 pages.

State Personnel Department documents – 22 pages

Vehicle Loss and Accident Form – 5 pages.

B. Pleadings:

140 copies @ \$.50 - \$70.00

Motion to Dismiss – 4 pages.

Answer to Amended Complaint – 9 pages.

Motion for Summary Judgment – 3 pages.

Memorandum in Support of Summary Judgment – 28 pages.

Evidentiary Submission in Support of Summary Judgment – 4 pages.

Reply Brief – 10 pages.

Evidentiary Submission in Support of Reply Brief – 3 pages.

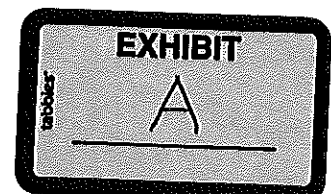
Reply to Order to Show Cause – 4 pages.

Deposition Designations – 3 pages.

Proposed Voir Dire – 3 pages.

Proposed Jury Instructions – 19 pages.

Motion in Limine – 3 pages.



Proposed Verdict Form – 5 pages.
Motion for New Trial – 4 pages.
Motion for Judgment as a Matter of Law – 4 pages.
Brief in Support of New Trial and Judgment as Matter of Law – 35 pages.
Notice of Appeal – 3 pages.

C. Trial exhibits.

10 sets of 182 pages @ \$.50 – \$910.00.

4. Other Costs:

Total Deposition Costs – \$1,156.25
A. Deposition of Alverene Butler - \$464.40. (See Exhibit D.)
B. Deposition of Karen Stacey, Patrick Jackson and Mark Waits - \$253.75. (See Exhibit D.)
C. Deposition of Kelvin Johnson - \$438.10. (See Exhibit E.)

5. Costs as shown on Mandate of Court of Appeals – \$199.80. (See Exhibit F.)

Total Costs – **\$4,854.15**

RESPECTFULLY SUBMITTED

s/ Stacey S. Houston
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